

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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OFFICE OF THE SECRETARY

In the Matter of)
)
Administration of the)
North American Numbering Plan)
Carrier Identification Codes (CICs))
_____)

CC Docket No. 92-237

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**REPLY COMMENTS OF THE
UNITED STATES TELEPHONE ASSOCIATION**

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April 3, 1998

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TABLE OF CONTENTS

SUMMARY	i
DISCUSSION	1

USTA - 4/3/98

SUMMARY

In these reply comments, USTA addresses itself to a proposal presented by IXCLD concerning the use of RICs with CICs. USTA notes that the implications of the proposal are potentially significant; and therefore, no action on the proposal should be taken by the Commission until the industry has had an opportunity to thoroughly evaluate the proposal. USTA suggests that the Commission encourage IXCLD to introduce its RIC proposal to the INC as an issue for consideration.

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**REPLY COMMENTS OF THE
UNITED STATES TELEPHONE ASSOCIATION**

The United States Telephone Association (USTA),¹ through the undersigned, hereby submits its reply comments in the above-captioned proceeding pursuant to the Federal Communications Commission's (Commission) Further Notice of Proposed Rulemaking and Order.² USTA's reply comments are limited and responsive to the comments of IXC Long Distance, Inc. (IXCLD) that were filed herein on March 6, 1998.

DISCUSSION

In its comments, IXCLD suggests that four digit reseller indicator codes (RICs) be used

¹ USTA is the nation's oldest trade organization for the local exchange carrier industry. USTA currently represents more than 1200 small, mid-size and large companies worldwide.

² See Administration of North American Numbering Plan, Carrier Identification Codes (CICs), Further Notice of Proposed Rulemaking and Order, CC Docket No. 92-237, FCC 97-364 (rel. Oct. 9, 1997). See also, Order, CC Docket No. 92-237, DA 97-2439 (rel. Nov. 21, 1997), extending the time for filing comments and replies.

USTA - 4/3/98

to augment conservation plans employed for carrier identification codes (CICs).³ According to IXCLD:

By using four-digit RICs, which could be added to the underlying carrier's CIC, resellers would not need to obtain their own CICs to specifically identify their own services. RICs would thus allow resellers to accomplish their billing and name recognition goals, while decreasing the demand for CICs.⁴

IXCLD further contends that local exchange carriers are technically able to accommodate the use of RICs.⁵

USTA believes that the wisdom and feasibility of using RICs is, at best, an open question. To USTA's knowledge, the proposal presented by IXCLD has not been widely examined by the industry, and it would be premature and imprudent for the Commission to give consideration to the proposal at this time. The most appropriate response to IXCLD's proposal would be to recommend that IXCLD present its proposal to the Industry Numbering Committee (INC) in order to facilitate broad industry consideration of the proposal. Both as to its technical and policy implications, a proposal as potentially significant as this one should not be acted upon by the Commission until all interested industry participants have had an opportunity to thoroughly test the proposal and offer input on it. USTA believes that the best way in which to achieve broad-based industry consideration of the proposal is to refer the matter to the INC.

³ IXCLD Comments at pp. 8 and 9.

⁴ Id. at p. 8.

⁵ Id.


USTA - 4/3/98

Accordingly, USTA opposes Commission consideration of the IXCLD RIC proposal until such time as the industry has had an opportunity to fully evaluate it and understand its implications.

USTA suggests that the Commission encourage IXCLD to introduce its RIC proposal to the INC as an issue for consideration.

Respectfully submitted.

UNITED STATES TELEPHONE ASSOCIATION

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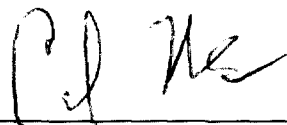
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CERTIFICATE OF SERVICE

I, Carl McFadgion, do certify that on April 3, 1998 copies of the Reply Comments of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the person on the attached service list.

A handwritten signature in black ink, appearing to read 'CJ Mc', is written over a horizontal line.

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